

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
vs.)	Case No. 4:20-CR-00212
)	
DEBRA LYNN MERCER-ERWIN (1))	
)	
Defendants.)	

**DEFENDANT DEBRA LYNN MERCER-ERWIN'S MOTION TO JOIN AND ADOPT
DEFENDANT MOFFETT'S OBJECTION TO THE REPORT AND
RECOMMENDATION OF THE UNITED STATES MAGISTRATE JUDGE**

The Defendant, Debra Lynn Mercer-Erwin (the "Defendant"), through her attorney of record, Joe E. White, Jr., respectfully requests permission to join and adopt the law and argument raised in the Defendant Moffett's Objection to the Report and Recommendation of the United States Magistrate Judge (Dkt. #376) (the "Objection").

CONCLUSION

In an effort to promote judicial economy and because the Defendant shares the arguments raised in the Objection, the Defendant requests that she be allowed to join and adopt the law and argument raised by the Objection.

Respectfully submitted,

s/ Joe E. White, Jr.
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CERTIFICATE OF DELIVERY

☒ I hereby certify that on this 7th day of April, 2023, I electronically transmitted the foregoing document to the Clerk of the Court using the ECF System for filing and transmittal of a Notice of Electronic Filing, which will automatically send e-mail notification of such filing to all attorneys of record.

s/ Joe E. White, Jr.

JOE E. WHITE, JR.

CERTIFICATE OF CONFERENCE

Pursuant to United States District Court for the Eastern District of Texas Local Rule CR-47(a)(3), on April 7th, 2023, defense counsel for the Defendant Debra Mercer-Erwin has attempted to confer with Ernest Gonzalez and Heather Rattan Assistant United States Attorneys in a good faith effort to resolve the matter without Court intervention. Defense counsel has not received a response and due to the urgency of this motion must advise the Court that the United States opposes it.

s/ Joe E. White, Jr.

JOE E. WHITE, JR.